

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AUTOEXPO ENT INC., PEACE PROPERTIES, LLC,
NETWORK REINSURANCE COMPANY INC.,
AUTO EXCHANGE CENTER, LLC, and CHROME
INSURANCE AGENCY LLC,

Plaintiffs,

v.

OMID ELYAHOU, SIMPSOCIAL LLC, FIFTY SEVEN
CONSULTING CORP. d/b/a CERTIFIED AUTO GROUP
a/k/a CERTIFIED PERFORMANCE MOTORS, AVI
EITAN and FAZEEDA KASSIM,

Defendants.

Hon. Orelia E. Merchant
M. J. Steven L. Tiscione

Civil Action No.
2:23-cv-9249

X
DECLARATION OF MATTHEW FEINMAN, ESQ.
IN FURTHER SUPPORT OF DEFENDANTS AVI EITAN, FIFTY
SEVEN CONSULTING CORP. D/B/A CERTIFIED AUTO GROUP
A/K/A CERTIFIED PERFORMANCE MOTORS AND
FAZEEDA KASSIM'S MOTION TO DISMISS PLAINTIFFS'
COMPLAINT PURSUANT TO FED. R. CIV. P. RULE 12(b)(1) AND (6)

Matthew Feinman, an attorney admitted to practice in this Court declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am associated with the Law Office of Steven Cohn, P.C., attorneys for defendants Avi Eitan, Fifty Seven Consulting Corp. d/b/a Certified Auto Group a/k/a Certified Performance Motors and Fazeeda Kassim (collectively, the "Certified Defendants").
2. I submit this Declaration along with the exhibit listed below and the Certified Defendants' reply memorandum of law, dated July 1, 2024, in further support of the Certified Defendants' motion for an order (i) dismissing the First, Second, Third, Fourth and Sixth Causes of Action of Plaintiffs' Complaint, and, the Complaint in its entirety as against the Certified

Defendants, pursuant to Rule 12(b)(1) and (b)(6) of the Federal Rules of Civil Procedure, and (ii) granting the Certified Defendants such other and further relief as may be just, proper and equitable.

3. Submitted herewith is the following exhibit in further support of the Certified Defendants' Motion is a true and correct copy of:

Exhibit C The Complaint in *Superb Motors Inc. v Deo*, No. 2:23-cv-6188

Dated: July 1, 2024

/s/ Matthew Feinman
MATTHEW FEINMAN